EXECUTIVE SUMMARY

ES-1 INTRODUCTION

This Environmental Impact Report has been prepared in compliance with the California Environmental Quality Act (CEQA) to assist the California Environmental Protection Agency's Department of Toxic Substances Control (DTSC) in the consideration of a Part B permit application for the operation of a hazardous waste treatment and storage facility owned and operated by Exide Technologies, a secondary lead smelter. DTSC has principal responsibility for approving the project at the facility and is the Lead Agency under the California Environmental Quality Act (CEQA, Pub. Resources Code §21000 et seq.) and Implementing Guidelines [California Code of Regulations (CCR), Title 14, §15000 et seq.] for preparation and approval of the DEIR.

ES-2 PROJECT OVERVIEW

ES-2.1 PROJECT LOCATION

The Exide Technologies secondary lead recycling facility (formerly known as the GNB Technologies Inc. facility) is located in the southern half of Los Angeles County at 2700 S. Indiana Avenue (site) in the City of Vernon, California (see Figures 2-1 and 2-2). This facility occupies approximately 24 acres of land on two parcels bisected by Indiana Avenue. The administrative office building is located on the east side of Indiana Avenue and the industrial complex is located on the west side. The Exide Technologies (Exide) facility and adjacent areas are located in the City of Vernon's M-2 heavy industrial/warehousing zone and surrounded by industrial uses.

ES-2.2 PROJECT DESCRIPTION

DTSC is considering the issuance of a full Hazardous Waste Facility Permit to Exide that would authorize the company to continue to operate. This action is being conducted pursuant to California Health and Safety Code (H&SC) §25200 and CCR, Title 22, Division 4.5, Chapter 20.

Exide is a secondary lead recycling facility that recycles lead batteries and other lead bearing material. Exide receives spent lead-acid batteries and other lead bearing material via truck and processes them to recover lead and polypropylene. The Exide facility produces 100,000 to 120,000 tons of lead annually. Incoming spent batteries are either charged directly to the battery breaker or temporarily stored for a short period of time in the battery storage areas, which are covered receiving areas. Spent automotive batteries comprise about 95 percent of the facility's feed material.

Tanks are utilized to manage the spent electrolyte (waste acid) that is separated from the lead-bearing components for recovery. This separation occurs in the facility's Raw

Material Preparation System (RMPS). The RMPS is a mechanized system that separates the spent lead acid battery components. Whole batteries, which are partially drained of sulfuric acid, are conveyed from the battery receiving bin to the hammer mill system. The batteries are crushed, the acid drained, and the solids passed through a series of screens and hydroseparation processes to yield separate streams of waste acid, metallic lead, polypropylene, rubber and plastic separator fluff, and lead sulfate paste.

Liquid collected from the RMPS is pumped along with the lead sulfate paste to three above ground tanks where soda ash is added to both neutralize the solution and react with the lead sulfate to produce a lead carbonate paste for feed to the reverberatory smelting furnace. The recovered metal and paste are stored in the reverberatory furnace feed room and fed into the reverberatory furnace for the recovery of lead.
The solid battery components pass from the vibrating screen at the Hammer Mill to structures called Elutriation Columns (East and West), which separate the grid metal from rubber chips/polypropylene. The rubber chips and polypropylene then pass through a hydrasieve and are further separated in the Sink/Float Separator. The polypropylene is loaded into trailers and shipped off-site for recycling into battery casings and other plastic products. Overflow from the hydrasieve goes to the Recycle Tank and is pumped back to the elutriation columns.

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The furnace feed materials generated or received by the facility are stored for short periods of time in enclosed structures referred to as the Reverb or Blast Furnace Feed Rooms. The Reverb Furnace Feed Room receives materials generated from the RMPS process. The Blast Furnace Feed Room receives reverb furnace slag and drums/totes of plant scrap. A corridor also was constructed between the reverberatory furnace feed room and the blast feed rooms to minimize the generation of fugitive emissions.

The facility uses two furnaces for the production of lead ingots: the reverberatory furnace and the blast furnace. The reverberatory furnace is used primarily to melt the metals and produce pure lead using the feed from the RMPS. The slag generated from the reverberatory furnace contains residual amounts of lead that is further recovered in the blast furnace. The blast furnace also receives the majority of the lead-bearing plant materials (scrap) received. These materials include off-specification battery plates, grids and terminals, battery paste, and other lead-bearing material. Molten lead from the furnaces is tapped from the furnace into molds and cooled to form lead ingots or blocks. The smelter building houses covered storage for finished goods (lead ingots).

The facility has an extensive air pollution control system regulated by the South Coast Air Quality Management District. A variety of controls are used to minimize emissions from baghouse dust, refinery dross, wastewater sludge, and blast furnace raw material. Reverberatory furnace raw material is contained in enclosed buildings that are vented to baghouses. The furnaces also are vented to baghouses with a more than 99 percent recovery efficiency. Exide has implemented a fugitive dust control plan that includes daily application of water on pavement within the active portion of the facility and washing vehicles operating at the facility.

ES-2.3 NEED FOR THE PROPOSED PROJECT

The DTSC is currently considering Exide's Part B permit application (under the California Code of Regulations Title 22, Section 66270, Article 2), in accordance with the federal Resource Conservation and Recovery Act (RCRA). The permit request is for the continuance of current operations that involve the treatment, storage, and transfer of hazardous and non-hazardous wastes related to the recycling of used automotive batteries and other lead-bearing material into reusable lead ingots and the recycling of polypropylene material. Current state law requires preparation of an EIR for the project (California Public Resources Code Section 21151.5). DTSC has been designated as the Lead Agency for the preparation of the EIR.

Exide needs DTSC approval of the Part B permit to allow the facility to continue to operate in order to be consistent with the current provisions of the H&SC, Division 20, Chapter 6.5, and CCR, Title 22, Division 4.5.

ES-2.4 PROJECT OBJECTIVES

The objectives for the continued operation of the Exide site, in accordance with state and federal regulations, are as follows:

- To continue to recycle lead-acid batteries and other scrap lead-bearing material into reusable lead ingots and polypropylene material.
- Allow for the phased implementation of remedial measures consistent with maintenance of health and safety of workers and the general public.

ES-2.5 ENVIRONMENTAL RESOURCE AREAS EVALUATED

CEQA Guidelines §15125 requires that an EIR include a description of the physical environmental conditions in the vicinity of the proposed project as they exist at the time the NOP is published, or if no NOP is published, at the time the environmental analysis is commenced, from both a local and regional perspective. The environmental setting normally constitutes the baseline physical conditions by which a lead agency determines whether an impact is significant. In this case, the "baseline" analysis is slightly different because the facility has been, and is presently, operating in much the same manner as it will be permitted. EIRs generally focus on those aspects of the environment that could be

adversely affected by Exide as determined in the Notice of Preparation. The NOP for the Exide facility was prepared in April 1993. Changes to the CEQA guidelines and environmental checklist have occurred since that time. Therefore, the environmental analysis herein addresses all the environmental resources required under the revised CEQA guidelines. Therefore, the following environmental resources are addressed in Chapter 3 - Environmental Setting, Impacts, and Mitigation Measures: Aesthetics; Agricultural Resources; Air Quality; Biological Resources; Cultural Resources; Geology and Soils; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Noise; Population and Housing; Public Services; Recreation; Transportation/Circulation; and Utilities and Service Systems

ES-3 SIGNIFICANT EFFECTS, PROPOSED MITIGATION MEASURES AND ALTERNATIVES THAT WOULD REDUCE OR AVOID THOSE EFFECTS

ES-3.1 SIGNIFICANT EFFECTS AND MITIGATION MEASURES

Anticipated environmental effects of the proposed project are evaluated in Chapter 3.0 for each environmental area. Feasible mitigation measures that could minimize significant adverse impacts are identified. The Significant environmental impacts, mitigation measures and residual impacts are shown in Table ES-1.

The DEIR concluded that the proposed project would result in potentially significant adverse air quality impacts. No feasible mitigation measures or alternatives were identified that would not eliminate the potentially significant adverse air quality impacts. The impacts of the continue operation of Exide on all other environmental resources was determined to be less than signficiant.

ES-3.2 EVALUATION OF PROJECT ALTERNATIVES

The CEQA Guidelines (CCR §15126.6(a)) require that a DEIR consider alternatives to the proposed project if significant impacts are found that cannot be mitigated.

The alternatives are summarized below:

Alternative 1: No Project Alternative;

Alternative 2: Alternative Site; and

Alternative 3: Reduced Scale Alternative

A complete evaluation of these alternatives, including their ability to meet the objectives of the proposed project, and their ability to avoid or substantially reduce significant environmental impacts, is provided in Chapter 4.0 of the DEIR.

Analysis shows that the reduced operations alternative (Alternative 3) would be the environmentally superior choice from the alternatives presented in this chapter. The reduced operations alternative would reduce overall project impacts; however Alternative 3 would not reduce the potentially significant air quality impacts associated with the operation of the Exide facility and the air quality impacts under Alternative 3 would remain significant. If fact, transportation emissions would be higher under Alternative 3. Further, Alternative 3 would not achieve the project goal or the goals of the Los Angeles County Hazardous Waste Management Plan of providing sufficient recycling capabilities for lead generated in Los Angeles County or California. Therefore, the proposed project is preferred over Alternative 3.

ES-4 AREAS OF CONTROVERSY/CONCERN

Based on comments received during the public scoping period, the impacts of the facility on human health and the associated hazards are of concern to the surrounding community. No other areas of controversy were identified for the Exide facility.

ES-5 ISSUES TO BE RESOLVED

There are no outstanding issues to be resolved with regard to the environmental analysis contained in this EIR.

TABLE ES-1

Summary of Environmental Impacts, Mitigation Measures and Residual Impacts

IMPACT	MITIGATION MEASURES	RESIDUAL IMPACTS
AESTHETICS The views of the Exide facility are expected to remain the same. No scenic highways or corridors or visual resources are located in the Vernon area so no significant impacts are expected.	No significant impacts on aesthetics were identified so no mitigation measures are required.	Proposed project impacts on aesthetics are less than significant.
AGRICULTURAL RESOURCES There are no agricultural resources located in the Vernon area so the project will not impact agricultural resources.	No significant impacts on agricultural resources were identified so no mitigation measures are required.	Proposed project impacts on agricultural resources are less than significant.
AIR QUALITY The issuance of the Part B permit is not expected to add new emission sources to the Exide facility so no increase in emissions is expected. The impacts associated with on-site emissions due to the continued operation of the Exide facility are less than significant for VOCs, CO, SOx, and on-site NOx emissions. Emissions of PM10 are expected to remain significant. NOx emissions from trucks are also expected to remain significant.	The Exide facility has already incorporated the use of Best Available Control Technology (BACT). BACT, by definition, is control equipment with the lowest achievable emission rate. The use of BACT controls emissions to the greatest extent feasible for all sources; therefore, no additional feasible mitigation measures are available for PM10 control. As U.S. EPA rules and fuel requirements become effective for diesel trucks, the NOx emission factor for trucks is expected to decrease to less than significant by 2015. NOx emissions associated with the Exide project will remain significant during that period. No other feasible mitigation measures have been identified.	Proposed project impacts on air quality remain significant for PM10 and NOx emissions from trucks. Facility impacts associated with VOCs, CO, SOx, and on-site NOx emissions are less than significant.
The facility is in compliance with the ambient are quality standards for lead so the facility lead emissions are considered to be less than significant.	No significant impacts due to lead exposure are expected so no mitigation measures are required.	Proposed project impacts on lead emissions are less than significant.

TABLE ES-1

Summary of Environmental Impacts, Mitigation Measures and Residual Impacts

IMPACT	MITIGATION MEASURES	RESIDUAL IMPACTS
AIR QUALITY (cont.)		
The continued operation of Exide on toxic air contaminants are expected to be less than significant. The carcinogenic health impacts to the RMER, RMEW, sensitive populations and all other receptors are expected to be less than 10 per million and, therefore, less than significant. The cancer burden was expected to be less than 0.5 and less than significant.	No significant impacts on TAC impacts are expected to the RMER, RMEW, and local sensitive receptors so no mitigation measures are required.	Proposed TAC impacts on the incremental cancer risk at the RMER, RMEW and sensitive populations would be less than significant.
Exposure to non-carcinogenic TAC emissions from Exide are expected to be less than significant. The chronic and acute hazard index are both predicted to be below 1.0. Therefore, no significant non-chronic health impacts are expected.	No significant impacts on TAC impacts are expected so no mitigation measures are required.	Proposed acute and chronic health impacts are less than significant.
During the operational phase of the project, ambient concentrations of criteria pollutants, carbon monoxide hot spots, and the air quality management plan are expected to be less than significant.	No significant impacts are expected so no mitigation measures are required.	The impacts on ambient air quality, carbon monoxide hot spots, and the air quality management plan are less than significant.
BIOLOGICAL RESOURCES There are no biological resources located within the confines of the Exide facility. Construction of new facilities outside of the existing Exide facility will not occur. The proposed project will not impact biological resources.	No significant impacts on biological resources were identified so no mitigation measures are required.	Proposed project impacts on biological resources are less than significant.
CULTURAL RESOURCES There are no cultural resources located in the Vernon area. No additional construction is proposed so the project will not impact cultural resources.	No significant impacts on cultural resources were identified so no mitigation measures are required.	Proposed project impacts on cultural resources are less than significant.

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Summary of Environmental Impacts, Mitigation Measures and Residual Impacts

IMPACT	MITIGATION MEASURES	RESIDUAL IMPACTS
GEOLOGY AND SOILS Adverse project impacts on geological hazards (earthquakes or liquefaction), soils/topography, or other geological hazards are less than significant.	No significant impacts on geology/soils were identified so no mitigation measures are required. Compliance with the Uniform Building Codes is expected to minimize geological hazards.	The proposed project impacts on geology and soils resources are less than significant.
HAZARDS AND HAZARDOUS MATERIALS The proposed project will not introduce new hazards or hazardous materials to the existing facility. No significant impacts on hazards or hazardous materials are expected.	No significant impacts on hazards and hazardous materials were identified so no mitigation measures are required. Exide has prepared a Contingency Plan, and made arrangements with local fire, police, hospitals, and emergency response teams to coordinate emergency services, if needed.	The proposed project impacts on hazards and hazardous materials are less than significant.
HYDROLOGY AND WATER QUALITY The proposed project is not expected to result in impacts to ground water quality, ground water recharge, alter the drainage pattern of the site, create additional water runoff, be located within a 100-year flood hazard, expose people or structures to a potential for flooding, result in inundation by sieche, tsunami, or mudflow, result in a violation of the LACSD permit requirements for wastewater discharge, or result in a violation of the NPDES permit requirements.	No significant impacts on hydrology and water quality were identified so no mitigation measures are required. Exide is required to implement the RCRA Facility Investigation and corrective action process for soil and ground water remediation, as deemed necessary. Wastewater and storm water permits have been issued to the facility. Compliance with these permit conditions are expected to minimize impacts on wastewater treatment facilities and storm water runoff.	The proposed project impacts on hydrology and water quality are less than significant.
LAND USE AND PLANNING The Exide facility is compatible with the heavy industrial zoning designation of the area. The issuance of the Part B permit will not result in construction outside of the existing facility boundaries and will not alter the land use of the facility, so no significant impacts are expected.	No significant impacts on land use and planning were identified so no mitigation measures are required.	The proposed project impacts on land use and planning are less than significant.

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Summary of Environmental Impacts, Mitigation Measures and Residual Impacts

IMPACT	MITIGATION MEASURES	RESIDUAL IMPACTS
MINERAL RESOURCES There are no mineral resources located in the Vernon area so the project will not impact mineral resources.	No significant impacts on mineral resources were identified so no mitigation measures are required.	The proposed project impacts on mineral resources are less than significant.
NOISE The issuance of the proposed project is not expected to require additional noise-generating equipment or generate additional traffic. Noise impacts associated with operation of the proposed project are expected to be less than significant.	No significant impacts on noise were identified so no mitigation measures are required.	The proposed project impacts on noise are less than significant.
POPULATION/HOUSING The proposed project would not expand the existing facility and no new employees are expected. No impacts on population/housing are expected.	No significant impacts on population/housing were identified so no mitigation measures are required.	The proposed project impacts on population/housing are less than significant.
PUBLIC SERVICES The project is not expected to require additional police or fire protection services so no significant impacts are expected.	No significant impacts on public services were identified so no mitigation measures are required.	The proposed project impacts on public services are less than significant.
RECREATION There are no recreation facilities located in the Vernon area. The facility will not result in an increase in workers and will not impact recreational facilities..	No significant impacts on recreation were identified so no mitigation measures are required.	The proposed project impacts on recreation are less than significant.
TRAFFIC/CIRCULATION The proposed project would not result in an increase in employee vehicles or truck traffic. The proposed project impacts on traffic are expected to be less than significant.	No significant impacts on traffic/circulation were identified so no mitigation measures are required.	The proposed project impacts on traffic/circulation are less than significant.
UTILITIES AND SERVICE SYSTEMS The proposed project is not expected to result in a significant increase in water demand, hazardous waste generation, solid waste generation, electricity use, or natural gas use.	No significant impacts on utilities and service systems were identified so no mitigation measures are required.	The proposed project impacts on utilities and service systems are less than significant.